



AT&T Kentucky
601 W Chestnut Street
Room 407
Louisville, KY 40203

T: 502.582.8219
F: 502.582.1573
mary.keyer@att.com

September 15, 2008

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PUBLIC SERVICE
COMMISSION

VIA FEDERAL EXPRESS

Ms. Stephanie Stumbo
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

Re: dPi Teleconnect, LLC v. BellSouth Telecommunications, Inc.
KPSC 2005-00455

Dear Ms. Stumbo:

Enclosed for filing in the above-referenced case are the original and ten (10) copies of a Motion for Extension of the October 2, 2008 Hearing.

Thank you for your attention to this matter.

Sincerely,

Mary K. Keyer
General Counsel/Kentucky

Enclosures

cc: Parties of Record

720251

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

dPi TELECONNECT LLC)	
)	
Complainant)	
v.)	CASE NO. 2005-00455
)	
BELLSOUTH TELECOMMUNICATIONS, INC.)	
)	
Defendant)	

MOTION FOR EXTENSION

By Order dated September 9, 2008, the Commission scheduled a formal hearing in this matter for October 2, 2008. BellSouth Telecommunications, Inc. d/b/a AT&T Kentucky ("AT&T Kentucky"), by counsel, respectfully requests an extension of this hearing to a later date.

As grounds for its motion, AT&T Kentucky states that J. Phillip Carver, the AT&T counsel who has been handling the dPi proceeding in Kentucky and in the other states in which dPi Teleconnect LLC ("dPi") filed similar actions, will be retiring from the company effective September 30, 2008. AT&T Kentucky will need time to bring new counsel up to speed on the issues in this case.

Additionally, AT&T Kentucky's May 22, 2008, Motion to Compel dPi to respond to certain requests in AT&T Kentucky's First Data Requests to dPi dated January 31, 2008 is still pending before the Commission. AT&T Kentucky would like a ruling on the pending motion prior to the hearing as it believes the information requested in its First Data Requests is crucial to the presentation of its case to the Commission.

Counsel for dPi Teleconnect LLC has indicated he has no objection to this motion and has agreed to the extension.

Agreed To:

Respectfully submitted,

Douglas F. Brent
Stoll Keenon Ogden, PLLC

Douglas F. Brent
Stoll Keenon Ogden, PLLC
2000 PNC Plaza
500 W. Jefferson Street
Louisville, KY 40202

Mary K. Keyer

Mary K. Keyer
601 West Chestnut Street, Room 407
P. O. Box 32410
Louisville, KY 40232

Christopher Malish
Foster Malish Blair & Cowan, LLP
1403 West Sixth Street
Austin, TX 78703

J. Phillip Carver
Lisa S. Foshee
Suite 4300, BellSouth Center
675 West Peachtree Street, NE
Atlanta, GA 30375

COUNSEL FOR DPI
TELECONNECT LLC

COUNSEL FOR BELL SOUTH
TELECOMMUNICATIONS, INC.

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